

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

IN RE: NOTICE OF PROPOSED RULEMAKING

RM 06-02

(LSA Document # 06-45)

INITIAL COMMENTS OF THE INDIANA OFFICE
OF UTILITY CONSUMER COUNSELOR

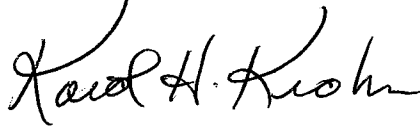
The Indiana Office of Utility Consumer Counselor (OUCC) submits the following initial comments regarding the Indiana Utility Regulatory Commission's (IURC) Proposed Rule RM 06-02 (LSA Document #06-45) to amend 170 IAC 7-6-1, *et seq.*

1. This revision demonstrates that the Commission has worked to address industry concerns, while also continuing to protect consumer interests by preserving advance notice and disclosure requirements to prevent interruptions in service to end users.

2. Although the OUCC has no further changes to recommend to the text of the proposed rule, the OUCC recommends that the IURC consider adding cites to the new telecommunications statute (H.E.A. 1279) to supplement, or where appropriate, to replace, current references to Ind. Code 8-1-2 or Ind. Code 8-1-2.6.

3. It is the OUCC's understanding that provisions concerning cessation of service by Providers of Last Resort apply only to obligations under H.E.A. 1279 – not to federal requirements for relinquishment of universal service in 47 U.S.C. 214(e)(4), which applies to eligible telecommunications carriers (ETCs), so designated by the IURC under 47 U.S.C. 214.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Karol H. Krohn". The signature is fluid and cursive, with the first name "Karol" and last name "Krohn" clearly distinguishable.

Karol H. Krohn, Attorney No. 5566-82
Assistant Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2215
infomgt@oucc.in.gov
317-232-2494 - Telephone
317-232-5923 - Facsimile